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WWR# 040489867

## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: CASE NO. 14-14966-AMC

BAKIR GUEDDI CHAPTER 13

Debtor

**Hearing Date: 11/26/2019** 

CITIZENS BANK, N.A. Hearing Time: 11:00 a.m.

Movant

## REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to F.R.C.P. 34, Movant hereby requests that the Debtors produce for inspection by the undersigned attorney for the Movant the following:

- 1. If you deny any or all of the subsections under Movant's Request for admission No. 1:
  - (a) Canceled check, receipt, proof of money order, or other documentation evidencing that the post-petition payment due on 6/21/2019 through 10/21/2019, was tendered to Movant.
- Copies of any and all documents, federal and state court opinions (whether published or unpublished), federal guidelines or other applicable statutory or common law bases upon which you rely in denying Plaintiff's Request for Admission Number 1.

Respectfully Submitted,

WELTMAN, WEINBERG & REIS CO., L.P.A.

/s/ Brian Langford Brian Langford Weltman, Weinberg & Reis Co., L.P.A. 436 7th Avenue Ste 2500 Pittsburgh, PA 15219 (412) 338-7102 Attorney for Movant